

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: **George Brown** : Chapter 13
:
:
Debtor : Bankruptcy No.: **18-15005**

REQUEST FOR ADMISSIONS

Pursuant to F.R.C.P.36, Objectors hereby request the following admissions of the Respondent:

1. Respondent alleges in the Proof of Claim **Principal & Interest due** in the amounts of **\$12,794.24**. Respondent admits that the aforesaid amount is inaccurate, in that it fails to give proof for all payments received.
2. Respondent alleges in the Proof of Claim **Prepetition fees due** in the amount of **\$520.00**. Respondent admits that the aforesaid amount is unreasonable and/or not actually incurred.
3. Respondent alleges in the Proof of Claim **Escrow deficiency for funds advanced** in the amount of **\$3,375.07**. Respondent admits that the aforesaid amount is unreasonable and/or not actually incurred.
4. Respondent alleges in the Proof of Claim **Projected escrow shortage** in the amount of **\$1,198.19**. Respondent admits that the aforesaid amount is unreasonable and/or not actually incurred.

Date: **March 28, 2019**

Respectfully submitted,

By: /s/ Michael D. Sayles

Michael D. Sayles
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